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October 4, 2024

VIA ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS
MDL No. 3080 | Bi-weekly Update and CMC Agenda

Dear Judge Martinotti:

We write on behalf of the parties regarding the Case Management Conference scheduled for Tuesday, October 8, 2024, and to provide a bi-weekly update.

On Monday, the parties will submit a proposed Plaintiff Fact Sheet in the Self-Funded Payer Track along with a proposed case management order implementing that Plaintiff Fact Sheet. The parties also continue to meet and confer in the State AG Track regarding the Plaintiff Fact Sheet for that track. While Plaintiffs and Defendants continue to narrow the issues, the parties in that track anticipate having to submit competing proposed Plaintiff Fact Sheets along with position statements on October 11, as indicated in the September 29 joint submission to the Court. Master discovery across all three MDL Tracks will commence following entry by the Court of a CMO governing such discovery [see ECF Nos. 269, 270].

Otherwise, the parties have conferred and do not have any agenda items for the Court to address.

Unless the Court would like to discuss these or any other issues with the parties in person, we respectfully suggest that this month's conference be adjourned.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s/ Matthew F. Gately
Matthew F. Gately
Liaison Counsel for
Class Action Track

/s/ Joanne Cicala
Joanne Cicala
Liaison Counsel for
The State Attorneys General Track

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Honorable Brian R. Martinotti, U.S.D.J.
October 4, 2024—Page 2

/s/ David R. Buchanan
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Liaison Counsel for
Self-Funded Payer Track

/s/ John D. Tortorella
John D. Tortorella

cc: All counsel of record